

Message

From: Borgias, Adriane P. (ECY) [ABOR461@ECY.WA.GOV]
Sent: 4/9/2013 10:44:12 PM
To: Mullin, Michelle [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2ae5fc11b98742bab4287b61e107018c-Mullin, Michelle R]
Subject: List of inadvertently produced PCB
Attachments: es100692h.pdf; es902413k.pdf; ABOR461-91003A39.PDF-20130408122607.pdf; ABOR461-20016IHN.TIF-20130409153946.pdf

Flag: Follow up

Michelle,

Good talking with you!

The list I am looking for is referred to in the attached ABOR pdf document (Economic Assessment) and summarized in Appendix A. Is there a specific list of manufacturing processes? And can they be linked to products that are in used (like the PCB in pigments?).

The other ABOR pdf ocument (100 questions) has a background summary on p 6-7 that explains to some extent where we are today.

Also of interest is this rulemaking (see excluded products): <http://www.regulations.gov/#!documentDetail;D=EPA-HQ-OPPT-2009-0757-0001>

"B. Excluded Manufacturing Process

The current definition states, "The concentration of inadvertently generated PCBs in products leaving any manufacturing site or imported into the United States must have an annual average of less than 25 ppm, with a 50 ppm maximum." EPA is considering whether to eliminate the annual average and whether the maximum concentration should be set at < 1 ppm. EPA's questions about excluded manufacturing processes are located in Unit XIV.V."

A summary of Lisa Rodenburg's (from Rutger's University) work is on our website: http://srrttf.org/?page_id=549. Scroll down to get to Lisa's talk. This is from a workshop we gave last year and I some of the other presentations may be of interest to you.

Kerry Hornbuckle/Dingfei Hu's work is attached (the ES pdf documents)

Hope I didn't overwhelm you but I think this captures the sum of what we are doing with respect to identifying the "inadvertently generated" sources.

Please feel free to contact me if you have any questions regarding Ecology. The programs are basically organizaed by air, water, waste to resources, toxics clean up, and a few others.

I can help you navigate the Ecology system to find the state expert.

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